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11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 AMERICAN PREPARATORY SCHOOLS,
14 INC., a Utah Corporation,

15 Plaintiff,

16 vs.

17 NEVADA CHARTER ACADEMIES d/b/a
18 AMERICAN PREPARATORY ACADEMY—
LAS VEGAS, a Nevada Corporation,
RACHELLE HULET, an individual,

19 Defendants.
20

Case Number:
2:20-cv-01205-JAD-NJK

ORDER TO
EXTEND TIME FOR FILING OF
RESPONSES TO THIRD AMENDED
COMPLAINT

21 Plaintiff American Preparatory Schools, Inc. (“Plaintiff”), by and through its counsel of
22 record, the law firms of Parr Brown Gee & Loveless and the Takos Law Group, LTD., Defendant
23 Nevada Charter Academies d/b/a American Preparatory Academy – Las Vegas (“APA”), by and
24 through its counsel of record, the law firms of Lipson Neilson P.C. and Hayes Wakayama, and
25 Defendant Rachelle Hulet (“Hulet”), by and through her counsel of record, the law firm of Hogan
26 Hulet, (collectively the “Parties”), hereby stipulate and agree as follows:

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1 1. On December 16, 2020, this Court filed an Order instructing the Plaintiff to file its
2 Third Amended Complaint no later than December 18, 2020, and Defendants to file their responses
3 to Plaintiff's Third Amended Complaint by January 15, 2021 [ECF No. 82].

4 2. On December 16, 2020, Plaintiff filed its Third Amended Complaint [ECF No. 83].

5 3. On January 12, 2021, a Notice of Appearance of Co-Defense Counsel was filed
6 noticing the appearance of the law firm of Hayes Wakayama as co-defense counsel for Defendant
7 APA, together with the law firm of Lipson Neilson [ECF No. 84].

8 4. The Parties had agreed to extend the deadline for Defendants' to file their responses
9 to Plaintiff's Third Amended Complaint for two weeks from January 15, 2021 up through and
10 including January 29, 2021. [ECF 87].

11 5. The reason for the Parties' requesting this instant third extension is they have
12 recently engaged in meaningful resolution discussions, and the parties wish to conduct such
13 negotiations without the complications that answers and counterclaims may create.

14 6. It is accordingly in the best interest of all Parties not to publish the Defendants'
15 responses to the Third Amended Complaint at this time, and the Parties have agreed that a two-
16 week extension will allow for further productive settlement discussions. Therefore, the Parties
17 agree to extend the deadline from January 29, 2021 to February 12, 2021.

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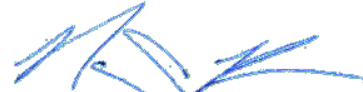
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1 7. This is the third submission of this request for extension of time to file responses to
2 Plaintiff's Third Amended Complaint.

3 IT IS SO STIPULATED.

4 Dated this 29th day of January, 2021

5 IT IS SO ORDERED.

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NANCY J. KOPPE
10 UNITED STATES MAGISTRATE JUDGE

11 DATED: January 29, 2021
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